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11 UBER TECHNOLOGIES, INC.,  
12 RASIER, LLC, and RASIER-CA, LLC

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16  
17 IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
18 LITIGATION

19 This Document Relates to:

20 *Jane Doe LS 98, Case No. 98 3:23-cv-*  
21 *05412*

22 *Jane Doe LS 326, Case No. 326 3:23-cv-*  
23 *05415*

24 *Jane Doe LS 245, Case No. 245 3:23-cv-*  
25 *05944*

26 *D.P., Case No. 3:24-cv-*  
27 *04449*

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.  
SHORTNACY IDENTIFYING CASES  
ELIGIBLE FOR DISMISSAL  
WITHOUT PREJUDICE PURSUANT  
TO THE COURT'S PRIOR ORDERS  
ON UBER'S MOTIONS TO DISMISS  
CASES FOR FAILURE TO COMPLY  
WITH COURT ORDERS**

Judge: Hon. Charles R. Breyer  
Courtroom: 6-17<sup>th</sup> Floor

28 DECL. OF MICHAEL B. SHORTNACY IDENTIFYING CASES ELIGIBLE FOR DISMISSAL WITHOUT  
PREJUDICE PURSUANT TO THE COURT'S PRIOR ORDERS ON UBER'S MOTIONS TO DISMISS CASES FOR  
FAILURE TO COMPLY WITH COURT ORDERS

1 *Jane Roe CL 16, Case No. 3:24-cv-*  
04837

2 *Jane Roe CL 24, Case No. 3:24-cv-*  
3 05536

4 *Jane Roe CL 34, Case No. 3:24-cv-*  
5 05696

6 *Jane Roe CL 36, Case No. 3:24-cv-*  
7 05720

8 *Jane Roe CL 37, Case No. 3:24-cv-*  
9 05728

10 *Jane Roe CL 42, Case No. 3:24-cv-*  
11 05740

12 *Jane Roe CL 43, Case No. 3:24-cv-*  
13 05741

14 *Jane Roe CL 48, Case No. 3:24-cv-*  
15 05810

16 *Jane Roe CL 53, Case No. 3:24-cv-*  
17 05831

18 *Jane Doe LS 268, Case No. 3:24-cv-*  
19 05910

20 *Jane Roe CL 65, Case No. 3:24-cv-*  
21 06189

22 *Jane Roe CL 71, Case No. 3:24-cv-*  
23 06864

24 *Jane Roe CL 77, Case No. 3:24-cv-*  
25 07571

26 *Jane Roe CL 78, Case No. 3:24-cv-*  
27 07584

28 *Jane Roe CL 79, Case No. 3:24-cv-*  
07587

*Jane Roe CL 81, Case No. 3:24-cv-*  
08521

1 *Jane Roe CL 83, Case No. 3:24-cv-*  
08525

2 *Jane Roe CL 84, Case No. 3:24-cv-*  
3 08526

4 *Jane Roe CL 85, Case No. 3:24-cv-*  
5 08754

6 *Jane Roe CL 86, Case No. 3:24-cv-*  
7 08756

8 *K.J., Case No. 3:24-cv-*  
9 09059

10 *Jane Roe CL 88, Case No. 3:24-cv-*  
11 09145

12 *G.C., Case No. 3:24-cv-*  
13 09195

14 *Jane Doe LS 547, Case No. 3:24-cv-*  
15 09208

16 *Jane Doe LS 548, Case No. 3:24-cv-*  
17 09211

18 *Jane Roe CL 91, Case No. 3:24-cv-*  
19 09235

20 *Jane Roe CL 92, Case No. 3:24-cv-*  
21 09237

22 *Jane Roe CL 98, Case No. 3:25-cv-*  
23 00853

24 *Jane Roe CL 101, Case No. 3:25-cv-*  
25 01118

26 *Jane Roe CL 102, Case No. 3:25-cv-*  
27 01120

28 *Jane Doe LS 550, Case No. 3:25-cv-*  
01327

*Jane Roe CL 107, Case No. 3:25-cv-*  
01470

1 *Jane Doe LS 553, Case No. 3:25-cv-*  
2 *01493*

3 *Jane Roe CL 109, Case No. 3:25-cv-*  
4 *01652*

5 *Jane Roe CL 110, Case No. 3:25-cv-*  
6 *01653*

7 *Jane Doe LS 554, Case No. 3:25-cv-*  
8 *01693*

9 *Jane Roe CL 114, Case No. 3:25-cv-*  
10 *01942*

11 *K.G., Case No. 3:25-cv-*  
12 *01962*

13 *TA.W., Case No. 3:25-cv-*  
14 *01967*

15 *Jane Roe CL 119, Case No. 3:25-cv-*  
16 *02133*

17 *Jane Roe CL 122, Case No. 3:25-cv-*  
18 *02138*

19 *Jane Doe LS 580, Case No. 3:25-cv-*  
20 *02460*

21 *Jane Roe CL 130, Case No. 3:25-cv-*  
22 *02742*

23 *Jane Doe LS 582, Case No. 3:25-cv-*  
24 *02792*

25 *Jane Doe LS 584, Case No. 3:25-cv-*  
26 *02806*

27 *Jane Doe LS 589, Case No. 3:25-cv-*  
28 *03216*

*Jane Doe LS 590, Case No. 3:25-cv-*  
*03217*

*Jane Roe CL 139, Case No. 3:25-cv-*  
*03255*

1 *Jane Doe LS 592, Case No. 3:25-cv-*  
2 *03266*

3 *Jane Doe LS 593, Case No. 3:25-cv-*  
4 *03269*

5 *Jane Doe LS 594, Case No. 3:25-cv-*  
6 *03274*

7 *T.G., Case No. 3:25-cv-*  
8 *03621*

9 *Jane Roe CL 125, Case No. 3:25-cv-*  
10 *02233*

11 *Jane Roe CL 128, Case No. 3:25-cv-*  
12 *02497*

13 *L.L., Case No. 3:25-cv-*  
14 *03742*

15 *Roe CL 148, Case No. 3:25-cv-*  
16 *03812*

17 *Roe CL 147, Case No. 3:25-cv-*  
18 *03811*

19 *Jane Roe CL 151, Case No. 3:25-cv-*  
20 *03816*

21 *Jane Doe CL 156, Case No. 3:25-cv-*  
22 *03944*

23 *Jane Roe CL 158, Case No. 3:25-cv-*  
24 *04038*

25 *Jane Roe CL 163, Case No. 3:25-cv-*  
26 *04386*

27 *T.S., Case No. 3:24-cv-*  
28 *00635*

*C.B., Case No. 3:25-cv-*  
*01961*

*Jane Doe LS 597, Case No. 3:25-cv-*  
*04070*

1 *Jane Doe LS 598, Case No. 3:25-cv-*  
2 *04071*

3 *Jane Roe CI 165, Case No. 3:25-cv-*  
4 *04589*

5 *Jane Roe CI 166, Case No. 3:25-cv-*  
6 *04591*

7 *T.T., Case No. 3:25-cv-*  
8 *04647*

9 *Jane Doe LS 601, Case No. 3:25-cv-*  
10 *04699*

11 *Jane Roe CL 17, Case No. 3:24-cv-*  
12 *04915*

13 *Jane Roe CL 38, Case No. 3:24-cv-*  
14 *05729*

15 *Jane Roe CL 67, Case No. 3:24-cv-*  
16 *06191*

17 *L.G., Case No. 3:24-cv-*  
18 *09036*

19 *Jane Roe CL 101, Case No. 3:25-cv-*  
20 *01118*

21 *Jane Roe CL 126, Case No. 3:25-cv-*  
22 *02495*

23 *Jane Roe CL 164, Case No. 3:25-cv-*  
24 *04587*

25 *Jane Doe LS 608, Case No. 3:25-cv-*  
26 *05312*

27 *Jane Doe LS 609, Case No. 3:25-cv-*  
28 *05328*

*Jane Doe LS 610, Case No. 3:25-cv-*  
*05374*

*Jane Roe CL 78, Case No. 3:25-cv-*  
*05537*

1 *Jane Roe CL 79, Case No. 3:25-cv-*  
2 *05538*

3 *Jane Roe CL 182, Case No. 3:25-cv-*  
4 *05628*

5 *Jane Roe CL 181, Case No. 3:25-cv-*  
6 *05633*

7 *Jane Roe CL 183, Case No. 3:25-cv-*  
8 *05733*

9 *Jane Doe LS 615, Case No. 3:25-cv-*  
10 *05887*

11 *Jane Roe CL 186, Case No. 3:25-cv-*  
12 *06086*

13 *Jane Doe NLG (M.E.), Case No. 3:25-cv-*  
14 *06480*

15 *Jane Doe LS 37, Case No. 3:23-cv-*  
16 *04393-CRB*

17 *Jane Doe LS 244, Case No. 3:23-cv-*  
18 *05372-CRB*

19 *WHB 1027, Case No. 3:24-cv-*  
20 *04820-CRB*

21 *WHB 928, Case No. 3:24-cv-*  
22 *04825-CRB*

23 *WHB 511, Case No. 3:24-cv-*  
24 *04842-CRB*

25 *WHB 1023, Case No. 3:24-cv-*  
26 *04877-CRB*

27 *WHB 1293, Case No. 3:24-cv-*  
28 *04817-CRB*

*WHB 1590, Case No. 3:24-cv-*  
*04946-CRB*

*WHB 689, Case No. 3:24-cv-*  
*04965-CRB*

1 *WHB 1497, Case No. 3:24-cv-*  
2 *04891-CRB*

3 *WHB 1619, Case No. 3:24-cv-*  
4 *04961-CRB*

5 *WHB 676, Case No. 3:24-cv-*  
6 *05024-CRB*

7 *WHB 666, Case No. 3:24-cv-*  
8 *05127-CRB*

9 *WHB 703, Case No. 3:24-cv-*  
10 *05361-CRB*

11 *WHB 1272, Case No. 3:24-cv-*  
12 *05366-CRB*

13 *A.T. (2), Case No. 3:24-cv-*  
14 *05592-CRB*

15 *WHB 1661, Case No. 3:24-cv-*  
16 *05468-CRB*

17 *WHB 1043, Case No. 3:24-cv-*  
18 *05501-CRB*

19 *WHB 1414, Case No. 3:24-cv-*  
20 *05495-CRB*

21 *WHB 1468, Case No. 3:24-cv-*  
22 *05500-CRB*

23 *WHB 1677, Case No. 3:24-cv-*  
24 *05556-CRB*

25 *WHB 935, Case No. 3:24-cv-*  
26 *05776-CRB*

27 *WHB 1659, Case No. 3:24-cv-*  
28 *05565-CRB*

*WHB 1381, Case No. 3:24-cv-*  
*05603-CRB*

*WHB 1544, Case No. 3:24-cv-*  
*05622-CRB*



1 *H.L., Case No. 3:24-cv-*  
2 *04526-CRB*

3 *WHB 1552, Case No. 3:24-cv-*  
4 *05599-CRB*

5 *WHB 1348, Case No. 3:24-cv-*  
6 *05669-CRB*

7 *WHB 1611, Case No. 3:24-cv-*  
8 *05665-CRB*

9 *WHB 1556, Case No. 3:24-cv-*  
10 *05986-CRB*

11 *WHB 946, Case No. 3:24-cv-*  
12 *05698-CRB*

13 *WHB 1142, Case No. 3:24-cv-*  
14 *05712-CRB*

15 *WHB 1057, Case No. 3:24-cv-*  
16 *05715-CRB*

17 *WHB 871, Case No. 3:24-cv-*  
18 *05770-CRB*

19 *WHB 991, Case No. 3:24-cv-*  
20 *05959-CRB*

21 *WHB 884, Case No. 3:24-cv-*  
22 *05948-CRB*

23 *Jane Doe LS 303, Case No. 3:24-cv-*  
24 *05980-CRB*

25 *Jane Doe LS 248, Case No. 3:24-cv-*  
26 *05647-CRB*

27 *Jane Doe LS 514, Case No. 3:24-cv-*  
28 *05658-CRB*

*Jane Doe LS 153, Case No. 3:24-cv-*  
*06011-CRB*

*Jane Doe LS 494, Case No. 3:24-cv-*  
*05547-CRB*

1 *Jane Doe LS 233, Case No. 3:24-cv-*  
2 *06030-CRB*

3 *Jane Doe LS 207, Case No. 3:24-cv-*  
4 *05965-CRB*

5 *Jane Doe LS 125, Case No. 3:24-cv-*  
6 *05982-CRB*

7 *Jane Doe LS 363, Case No. 3:24-cv-*  
8 *05891-CRB*

9 *Jane Doe LS 523, Case No. 3:24-cv-*  
10 *05155-CRB*

11 *Jane Roe CL 73, Case No. 3:24-cv-*  
12 *07030-CRB*

13 *WHB 1999, Case No. 3:24-cv-*  
14 *07048-CRB*

15 *D.C. 2636, Case No. 3:24-cv-*  
16 *09367-CRB*

17 *B.B., Case No. 3:24-cv-*  
18 *07492-CRB*

19 *A.A. (3), Case No. 3:24-cv-*  
20 *07549-CRB*

21 *Jane Doe NLG (H.K.), Case No. 3:24-cv-*  
22 *08614-CRB*

23 *C.B., Case No. 3:24-cv-*  
24 *09049-CRB*

25 *D.J. (2), Case No. 3:24-cv-*  
26 *09050-CRB*

27 *Jane Doe 691535, Case No. 3:24-cv-*  
28 *09523-CRB*

*Jane Doe 693827, Case No. 3:24-cv-*  
*09515-CRB*

*I.A. (2), Case No. 3:25-cv-*  
*00822-CRB*

1 *L.F. (4), Case No. 3:25-cv-*  
2 *01005-CRB*

3 *WHB 2060, Case No. 3:25-cv-*  
4 *01092-CRB*

5 *WHB 2061, Case No. 3:25-cv-*  
6 *01095-CRB*

7 *WHB 2070, Case No. 3:25-cv-*  
8 *01126-CRB*

9 *WHB 2073, Case No. 3:25-cv-*  
10 *01143-CRB*

11 *WHB 2075, Case No. 3:25-cv-*  
12 *01148-CRB*

13 *WHB 2077, Case No. 3:25-cv-*  
14 *01150-CRB*

15 *WHB 2036, Case No. 3:25-cv-*  
16 *01180-CRB*

17 *WHB 2039, Case No. 3:25-cv-*  
18 *01202-CRB*

19 *WHB 2043, Case No. 3:25-cv-*  
20 *01207-CRB*

21 *WHB 2047, Case No. 3:25-cv-*  
22 *01215-CRB*

23 *WHB 2048, Case No. 3:25-cv-*  
24 *01216-CRB*

25 *WHB 2049, Case No. 3:25-cv-*  
26 *01218-CRB*

27 *WHB 2051, Case No. 3:25-cv-*  
28 *01226-CRB*

*WHB 2054, Case No. 3:25-cv-*  
*01244-CRB*

*WHB 2057, Case No. 3:25-cv-*  
*01249-CRB*

1 *WHB 2059, Case No. 3:25-cv-*  
2 *01255-CRB*

3 *K.B. (4), Case No. 3:25-cv-*  
4 *02650-CRB*

5 *Jane Doe NLG (KS) (2), Case No. 3:25-cv-*  
6 *02616-CRB*

7 *Jane Doe NLG (IM), Case No. 3:25-cv-*  
8 *02771-CRB*

9 *Jane Roe CL 143, Case No. 3:25-cv-*  
10 *03260-CRB*

11 *J.M. (5), Case No. 3:25-cv-*  
12 *03364-CRB*

13 *Roe CL 153, Case No. 3:25-cv-*  
14 *03818-CRB*

15 *M.S. (5), Case No. 3:25-cv-*  
16 *01863-CRB*

**DECLARATION OF MICHAEL B. SHORTNACY**

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration collecting and identifying for the Court's reference the cases that are eligible for dismissal without prejudice pursuant to the Court's prior Orders [ECF No. 3666; ECF No. 3861; ECF No. 3862; ECF No. 3922; ECF No. 3921; ECF No. 4220; ECF No. 4221] on Uber's Motions to Dismiss Cases for Failure to Comply with Court Orders [ECF No. 3493; ECF No. 3677 ECF No. 3682; ECF No. 3731; ECF No. 3912; ECF No. 4026; ECF No. 4027].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true based on my own personal knowledge, and if called to testify, I could competently do so.

3. Uber moved the Court to dismiss Plaintiffs' cases for failing to comply with Pre-trial Order ("PTO") 5 or PTO 10 on July 16, 2025, August 11, 2025, August 12, 2025, September 15, 2025, and September 26, 2025 (collectively, "Uber's Motions"). ECF No. 3493; ECF No. 3677; ECF No. 3682; ECF No. 3731; ECF No. 3912; ECF No. 4026; ECF No. 4027.

4. After considering each of Uber's Motions, the Court ordered that the Plaintiffs subject to each motion comply with their PTO 5 or PTO 10 obligations within 14 days of the entry of the Court's Order. ECF No. 3666; ECF No. 3861; ECF No. 3862; ECF No. 3921; ECF No. 3922; ECF No. 4220; ECF No. 4221.

5. The Court's Orders on Uber's Motions set out a process to identify the Plaintiffs who had failed to comply with their Court-ordered obligations, whereby Defendants submitted a declaration identifying those Plaintiffs who failed to comply. The Court's Orders also provided Plaintiffs who disagreed with their inclusion in Uber's declaration the opportunity to submit their own declaration to dispute the issue. The Court would then review the declarations and "dismiss without

1 prejudice the claims of any Plaintiff who does not comply[.]” ECF No. 3666; ECF No. 3861; ECF No.  
2 3862; ECF No. 3921; ECF No. 3922; ECF No. 4220; ECF No. 4221.

3 6. Uber filed declarations as contemplated by the process outlined in the Court’s Orders  
4 identifying the Plaintiffs who failed to comply with each Order. ECF No. 3743; ECF No. 3988; ECF  
5 No. 3991; ECF No. 4072; ECF No. 4042; ECF No. 4375; ECF No. 4376. However, the Court has yet  
6 to dismiss the Plaintiffs’ cases identified in Uber’s declarations.

7 7. There is still good cause to dismiss many of these Plaintiffs’ cases now, because based  
8 on Counsel for Uber’s review of submissions to MDL Centrality, as of December 10, 2025, many of  
9 the Plaintiffs previously identified in Uber’s declarations have still yet to comply with their Court-  
10 ordered obligations.

11 8. For the Court’s reference, counsel for Uber compiled a list of the Plaintiffs, identified  
12 in the table attached to this declaration as Exhibit A, meeting the following criteria. Specifically, those  
13 Plaintiffs who: (i) have not complied with their Court-ordered obligations, (ii) were previously  
14 identified in Uber’s prior declarations made pursuant the Court’s Orders on Uber’s Motions for failing  
15 to comply their PTO 5 or PTO 10 obligations, and (iii) were not previously the subject of any prior  
16 declaration by counsel for Plaintiffs made pursuant the Court’s Orders on Uber’s Motions for failing  
17 to comply their PTO 5 or PTO 10 obligations. Because the Plaintiffs identified in Exhibit A meet all  
18 the forgoing criteria, these Plaintiffs’ cases are now ripe for immediate dismissal, without prejudice,  
19 pursuant to the Court’s prior Orders.

20  
21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on December 12, 2025, in Los Angeles, California.

23  
24 /s/Michael B. Shortnacy  
25 Michael B. Shortnacy  
26  
27  
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